

15-244



1300 NORTH 17th STREET, 11th FLOOR
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400
FAX: (703) 812-0486
www.fhhlaw.com
www.commlawblog.com

ACCEPTED/FILED

OCT - 8 2015

Federal Communications Commission
Office of the Secretary

MITCHELL LAZARUS
(703) 812-0440
LAZARUS@FHHLAW.COM

December 3, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Request for Waiver of the 71-76/81-86 GHz Antenna Rules filed by Aviat Networks on April 5, 2013.

Dear Ms. Dortch:

Kindly associate the attached letter with the above-captioned Request for Waiver.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mitchell Lazarus'.

Mitchell Lazarus
As a courtesy to HUBER+SUHNER AG

cc (by hand and email):

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Ruth Milkman, Chief of Staff, Office of the Chairman
John S. Leibovitz, Special Advisor to the Chairman and Deputy Chief, Wireless Telecom. Bur.
Roger C. Sherman, Acting Chief, Chief, Wireless Telecom. Bur.
James Schlichting, Senior Deputy Chief, Wireless Telecom. Bur.
Tom Peters, Chief Engineer, Wireless Telecom. Bur.
Melissa Lidden Tye, Legal Advisor, Wireless Telecom. Bur.
Blaise Scinto, Chief, Broadband Div., Wireless Telecom. Bur.
John Schauble, Deputy Chief, Broadband Div., Wireless Telecom. Bur.
Stephen Buenzow, Deputy Chief, Broadband Div., Wireless Telecom. Bur.
Charles Oliver, Attorney Advisor, Broadband Div., Wireless Telecom. Bur.
Brian Wondrack, Attorney Advisor, Broadband Div., Wireless Telecom. Bur.

FLETCHER, HEALD & HILDRETH, P.L.C.

HUBER+SUHNER AG 9100 Herisau, Switzerland

Fletcher, Heald & Hildreth
Mitchell Lazarus
lazarus@fhhlaw.com

for forwarding to the
Federal Communications Commission.

HUBER+SUHNER AG
Radiofrequency Division
Degersheimerstrasse 14
9100 Herisau
Switzerland

Matthias Fries PhD
Product Line Manager Antennas
Radio Frequency Division
Phone +41 (0)71 353 4348
matthias.fries@hubersuhner.com
www.hubersuhner.com

Reference 4348
Date 22.08.2013
Page 1 of 1

Support for Aviat's Flat Antenna Waiver Request (FCC)

To whom it may concern

In reference to the "Request for Waiver of the 71-76/81-86 GHz Antenna Rules filed by Aviat Networks on April 5, 2013" we would like to emphasise the importance of small form factor antennas for the evolution of today's Cellular Network. The fast growth of wireless data traffic on handheld devices necessitates a massive upgrade of the cellular network infrastructure in urban areas. A large number of so called small cells will be rolled out on street level. Wireless backhaul will be the predominant technology to connect small cells on street level to the network. 38dBi flat panel antennas covering the frequency range 71-76/81-86GHz allow the design of cost effective small size backhaul solutions that can integrate into the urban environment near street level. With current status FCC regulations advanced (flat panel) antenna technology cannot be used in the United States. By default, operators need to use 1-ft or 2-ft parabolic antennas instead. Antennas of this size do aesthetically not integrate well in street level environment. This limits the use of microwave backhaul on street level to a large extent and therefore hinders a fast and cost effective evolution of the Cellular Network. There is a large consensus about this among network operators and microwave backhaul manufacturers.

Our objective is to ensure operators have timely access to antennas that occupy the smallest volume in urban deployment scenarios such as rooftops, building walls or street furniture (pole tops, etc.). This will allow the industry to cope with the ever and rapidly increasing data traffic demands.

Yours sincerely
Matthias Fries PhD
Product Line Manager Antennas

